



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

August 18, 2020

Brandon LaVerne  
Chief Financial Officer  
Ontrak, Inc.  
2120 Colorado Ave., Suite 230  
Santa Monica, CA 90404

**Re: Ontrak, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2019**  
**Filed March 16, 2020**  
**File No. 001-31932**

Dear Mr. LaVerne:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences